

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

JASON WILLIAMS,

Plaintiff,

v.

AT&T MOBILITY LLC,

Defendant.

Case No.: 5:19-cv-00475-BO

DECLARATION OF ANN A. BECK

I, Ann A. Beck, declare as follows:

1. I am a U.S. citizen over the age of eighteen (18) years. I make this Declaration in support of Defendant AT&T Mobility LLC's ("AT&T") Response to Plaintiff Jason William's Motion to Compel Production of Documents. The facts set forth in this Declaration are stated upon my own personal knowledge. If called to testify to the following, I could do so truthfully and competently.

2. I am an attorney duly licensed and admitted to practice law in the State of Missouri since September 2000, and I am employed by AT&T Services, Inc. as Assistant Vice President and Senior Legal Counsel. During the relevant period in this case, November 2018 – February 2019, I provided legal advice and counsel to AT&T's privacy organization in connection with alleged or reported data privacy incidents, including data breach claims and investigations into such claims.

3. On or about December 2018, Plaintiff Jason Williams reported an alleged breach of privacy involving his AT&T wireless account to employees of an AT&T retail store in Raleigh, North Carolina. In connection with my role as privacy counsel providing legal advice to AT&T, I supervised and reviewed the investigation of AT&T's Asset Protection group into the incident alleged by Mr. Williams.

4. The documents prepared by the Asset Protection group were provided for legal counsel review and were prepared at the direction of legal counsel in anticipation of litigation and to provide legal advice to AT&T regarding both Mr. Williams' anticipated claims and AT&T's compliance with state and federal data breach and privacy laws. These documents are entitled "CCPIM_10132021Download.pdf" and "2018-12-05-24013 AP Event.pdf" and are listed on the privilege log at issue on this Motion. I made the determination at the time that these documents were initially prepared in December 2018 that they were privileged pursuant to the attorney-client privilege and attorney work product doctrine. Since their creation, these documents have been maintained in an electronic database which restricts access to privileged documents.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 11th day of May 2022 at Dallas, Texas.



Ann A. Beck